

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR,
Plaintiff,

v.

CRAIG S. DONAIS;
RUSSELL F. HILLIARD;
DONAIS LAW OFFICES, PLLC;
UPTON & HATFIELD, LLP;
and MARY K. DONAIS,
Defendants.

Case No.1:23-cv-00374-JL

**PLAINTIFF'S NOTICE OF INTENT TO FILE A RENEWED BUT MODIFIED MOTION TO
EXTEND TIME TO FILE OPPOSITION TO DONAIS DEFENDANTS' MOTION TO
DISMISS BASED ON NEW OR ADDITIONAL GROUNDS/FACTORS THAT THE COURT
MAY NOT HAVE BEEN AWARE OF**

1. I hereby provide notice of my intent to file a renewed but modified motion to extend time to file opposition to the Donais defendants motion to dismiss. The renewed motion will provide new or additional grounds/factors not previously provided and will seek different relief than previously requested.
2. There are critically important facts and points that the court may not have been aware or may have overlooked or misapprehended, that I intend to bring to the court's attention.
3. Also, in their last filing, the Donais defendants provided to the court misleading information/statements or omissions that may have misled the court, to my prejudice. I intend to show the court these misleading statements and omissions designed to mislead the court. Once the court becomes aware of this, I believe it will impact the court's decision.
4. Similarly, I am in the process of communicating with the defendants about my motion, and hope to thereafter file the motion by today.
5. I ask the court to look out for my motion today and to treat it in an expedited manner so I can know how to proceed with respect to tomorrow's deadline.
6. I hereby reserve all rights with respect to this matter and do not waive any rights regarding this matter.

Respectfully submitted,
/s/Andre Bisasor
Plaintiff Andre Bisasor

October 24, 2023

CERTIFICATE OF SERVICE

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor
Andre Bisasor